

United States Senate

WASHINGTON, DC 20510

20

January 10, 2019

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Received & Inspected

JAN 16 2019

FCC Mailroom

Dear Chairman Pai,

We write today to ask you to review the enclosed letter, which was sent to our offices by stakeholders in the Monadnock Region of New Hampshire. We are concerned about the issues raised by these important community organizations regarding the Mobility Fund II (MFII) Challenge Process.

In the attached letter, the leaders from the Monadnock Region detail the significant time, energy and resources expended by local stakeholders to provide the required information to the FCC regarding MFII eligibility. Here in New Hampshire, many of our small towns do not have extensive resources to conduct the activities necessitated by the Challenge Process. Many of these towns are also rural communities covering large areas that require labor-intensive efforts in order to confirm the accuracy of the FCC's MFII maps.

We are pleased that the FCC has recently taken steps to further extend the timeline of the MFII Challenge Process, and appreciate the efforts made by FCC staff to work with our New Hampshire offices to offer technical assistance to our local communities. However, we share these communities' concerns that this Challenge Process has placed a significant burden on New Hampshire municipalities. Furthermore, we understand the frustration these stakeholders express at the claims of coverage made by some cellular providers. The data obtained by these stakeholders, at a significant cost in both time and money, suggests that those claims may be inaccurate. The FCC's process for challenging these maps has placed the onus on resource-strapped localities to disprove overstated claims.

We urge the FCC to seriously consider the concerns of the enclosed. In addition, we urge the FCC to learn from the issues resulting from the MFII process so that we can better deploy taxpayer resources in the future. Broadband and wireless communication access are vital to the economic development of rural communities in New Hampshire and across the country. We must put our communities in a position to succeed when we build and execute these federal programs.

Thank you for your attention to this request.

Sincerely,

A handwritten signature in blue ink that reads "Jeanne Shaheen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeanne Shaheen
United States Senator

A handwritten signature in blue ink that reads "Maggie Hassan". The signature is cursive and includes a small flourish at the end.

Margaret Wood Hassan
United States Senator

A handwritten signature in blue ink that reads "Ann McLane Kuster". The signature is cursive and has a long, sweeping horizontal line at the end.

Ann McLane Kuster
Member of Congress

A handwritten signature in blue ink that reads "Chris Pappas". The signature is cursive and has a long, sweeping horizontal line at the end.

Chris Pappas
Member of Congress



County of
Cheshire, New Hampshire



greater keene
CHAMBER OF COMMERCE

Connecting Business and Community in the Monadnock Region of NH



**Southwest
Region
Planning
Commission**



Your Primary Resource For Economic Development In Southwest New Hampshire

November 21, 2018

SUBJECT: FCC MF-II Challenge

New Hampshire's Federal Delegation, Public Utilities Commission, Interested Parties:

In many parts of Southwest New Hampshire, lower quality telecommunications service including 4G LTE becomes a limiting variable to economic competitiveness and quality of life. Based on what many of our communities felt were inaccurate coverage maps submitted to the FCC by providers, several municipalities in Cheshire County and the Monadnock Region have expressed interest in the Federal Communication Commission's MF-II Challenge. Staff from the New Hampshire Public Utilities Commission (PUC) have provided leadership in coordinating data collection activities and technical assistance to several municipalities in their efforts as part of the Challenge process.

The Challenge process itself creates a significant burden on municipalities and requires capital - financial, technical and volunteer - which is a lot to expect in a predominantly rural area. Despite the efforts of the PUC and citizen volunteers, we have not achieved full coverage of data testing throughout the Region, and the FCC's submission deadline is fast approaching.

Our organizations have stepped forward in providing resources to facilitate this process. Data collected to-date suggests the following:

1. Service availability is overstated in many parts of Southwest New Hampshire. Of the more than 20,500 data points collected in Southwest NH through November 19th, nearly 84% reveal a download speed of less than 5Mb.
2. Although a complete dataset has not been achieved to "fill-in" the entire square kilometer grid system of the Region, or even failed blocks to the 75% level required, the data as mapped suggests the likelihood of overstated service in areas that volunteers were not able to verify.
3. Additional time would be needed to complete data collection activities to the specifications of the Challenge process. This would be the case even if towns had gotten an earlier start.

4. The Challenge process is excessive and unreasonable to expect of rural communities in terms of required capital and volunteers within the timeframe made available.
5. Service coverage maps submitted to the FCC by providers vary in degree of accuracy. This calls into question the integrity or methodology of those providers whose service availability is more commonly overstated. Our understanding of the field data collected in the challenge process indicates a passing grade for service availability as follows: AT&T 17.6%; Sprint 28%; T-Mobile 22.8%; Verizon 4.3% - yet Verizon claims the highest levels of service among the four providers.

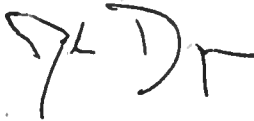
We cannot overstate the importance of access to quality telecommunications infrastructure to the economic competitiveness and quality of life in Southwest New Hampshire. Therefore, we appreciate whatever assistance our federal delegation, PUC and others are able to provide as we advocate for attention to this critical issue.



Chris Coates, Administrator
Cheshire County



Tim Murphy, Executive Director
Southwest Region Planning Commission



Jack Dugan, President
Monadnock Economic Development Corporation



Phil Suter, President & CEO
Greater Keene Chamber of Commerce



OFFICE OF
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

March 1, 2019

The Honorable Maggie Hassan
United States Senate
330 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Hassan:

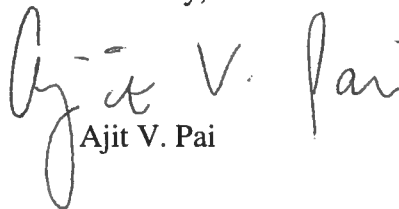
Thank you for your letter regarding the Mobility Fund II Challenge Process. As you know, bringing broadband to rural parts of America is my top priority and the Commission has dedicated a great deal of resources to accomplishing this goal.

Using updated and accurate broadband deployment data is critical to bridging the digital divide. We need to understand where broadband is available and where it is not in order to target our efforts and limited funding to areas that are most in need. That is why the Commission required strict standards for broadband deployment maps and a robust challenge process for Phase II of the Mobility Fund. And that's why I worked with my colleagues to extend the window for submitting challenges by an additional 90 days so that all challengers would have more time to participate in the process.

To ensure that the challenge process produced a high-quality map, we made sure state, local, and Tribal governments—not just carriers—were able to participate. To this end, Commission staff held on-site training events in a number of states, including New Hampshire, and actively worked with localities there to ensure a clear understanding of the process. And just this week, the Wireline Competition Bureau and the Wireless Telecommunications Bureau granted a waiver request from New Hampshire State Senator Jeanne Dietsch (on behalf of the New Hampshire Public Utilities Commission) to include evidence challenging T-Mobile's asserted coverage conducted on non-compliant handsets as part of the Mobility Fund II challenge process.

I appreciate your continued interest in this matter. Please contact me if I can be of any further assistance.

Sincerely,


Ajit V. Pai



OFFICE OF
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

March 1, 2019

The Honorable Ann McLane Kuster
U.S. House of Representatives
137 Cannon House Office Building
Washington, D.C. 20515

Dear Congresswoman Kuster:

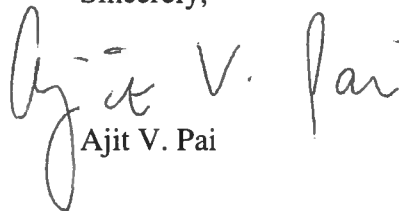
Thank you for your letter regarding the Mobility Fund II Challenge Process. As you know, bringing broadband to rural parts of America is my top priority and the Commission has dedicated a great deal of resources to accomplishing this goal.

Using updated and accurate broadband deployment data is critical to bridging the digital divide. We need to understand where broadband is available and where it is not in order to target our efforts and limited funding to areas that are most in need. That is why the Commission required strict standards for broadband deployment maps and a robust challenge process for Phase II of the Mobility Fund. And that's why I worked with my colleagues to extend the window for submitting challenges by an additional 90 days so that all challengers would have more time to participate in the process.

To ensure that the challenge process produced a high-quality map, we made sure state, local, and Tribal governments-not just carriers-were able to participate. To this end, Commission staff held on-site training events in a number of states, including New Hampshire, and actively worked with localities there to ensure a clear understanding of the process. And just this week, the Wireline Competition Bureau and the Wireless Telecommunications Bureau granted a waiver request from New Hampshire State Senator Jeanne Dietsch (on behalf of the New Hampshire Public Utilities Commission) to include evidence challenging T-Mobile's asserted coverage conducted on non-compliant handsets as part of the Mobility Fund II challenge process.

I appreciate your continued interest in this matter. Please contact me if I can be of any further assistance.

Sincerely,


Ajit V. Pai



OFFICE OF
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

March 1, 2019

The Honorable Chris Pappas
U.S. House of Representatives
323 Cannon House Office Building
Washington, D.C. 20515

Dear Congressman Pappas:

Thank you for your letter regarding the Mobility Fund II Challenge Process. As you know, bringing broadband to rural parts of America is my top priority and the Commission has dedicated a great deal of resources to accomplishing this goal.

Using updated and accurate broadband deployment data is critical to bridging the digital divide. We need to understand where broadband is available and where it is not in order to target our efforts and limited funding to areas that are most in need. That is why the Commission required strict standards for broadband deployment maps and a robust challenge process for Phase II of the Mobility Fund. And that's why I worked with my colleagues to extend the window for submitting challenges by an additional 90 days so that all challengers would have more time to participate in the process.

To ensure that the challenge process produced a high-quality map, we made sure state, local, and Tribal governments—not just carriers—were able to participate. To this end, Commission staff held on-site training events in a number of states, including New Hampshire, and actively worked with localities there to ensure a clear understanding of the process. And just this week, the Wireline Competition Bureau and the Wireless Telecommunications Bureau granted a waiver request from New Hampshire State Senator Jeanne Dietsch (on behalf of the New Hampshire Public Utilities Commission) to include evidence challenging T-Mobile's asserted coverage conducted on non-compliant handsets as part of the Mobility Fund II challenge process.

I appreciate your continued interest in this matter. Please contact me if I can be of any further assistance.

Sincerely,

A handwritten signature in black ink that reads "Ajit V. Pai".

Ajit V. Pai



OFFICE OF
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

March 1, 2019

The Honorable Jeanne Shaheen
United States Senate
506 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Shaheen:

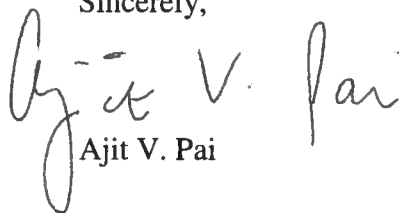
Thank you for your letter regarding the Mobility Fund II Challenge Process. As you know, bringing broadband to rural parts of America is my top priority and the Commission has dedicated a great deal of resources to accomplishing this goal.

Using updated and accurate broadband deployment data is critical to bridging the digital divide. We need to understand where broadband is available and where it is not in order to target our efforts and limited funding to areas that are most in need. That is why the Commission required strict standards for broadband deployment maps and a robust challenge process for Phase II of the Mobility Fund. And that's why I worked with my colleagues to extend the window for submitting challenges by an additional 90 days so that all challengers would have more time to participate in the process.

To ensure that the challenge process produced a high-quality map, we made sure state, local, and Tribal governments—not just carriers—were able to participate. To this end, Commission staff held on-site training events in a number of states, including New Hampshire, and actively worked with localities there to ensure a clear understanding of the process. And just this week, the Wireline Competition Bureau and the Wireless Telecommunications Bureau granted a waiver request from New Hampshire State Senator Jeanne Dietsch (on behalf of the New Hampshire Public Utilities Commission) to include evidence challenging T-Mobile's asserted coverage conducted on non-compliant handsets as part of the Mobility Fund II challenge process.

I appreciate your continued interest in this matter. Please contact me if I can be of any further assistance.

Sincerely,


Ajit V. Pai